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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 CHRISTOPHER STEPHEN HOUSLEY,
18 aka Robert White,

19 Defendant.

20 **CRIMINAL INDICTMENT**

21 Case No.: 2:22-cr-0160 APG BNW

22 **VIOLATIONS:**

23 21 U.S.C. §§846, 841(a)(1), and (b)(1)(C)–
24 Conspiracy to Distribute a Controlled
Substance—Tapentadol and Carisoprodol

25 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) –
26 Distribution of a Controlled Substance –
27 Tapentadol

28 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) –
29 Possession with Intent to Distribute a
Controlled Substance—Alprazolam

30 18 U.S.C. § 371 Conspiracy to Distribute
31 Misbranded Drugs

32 18 U.S.C. §§1956(h)– Money Laundering
33 Conspiracy

34 **THE GRAND JURY CHARGES THAT:**

COUNT ONE

Conspiracy to Distribute a Controlled Substance
(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C))

From a time unknown but no earlier than July 2020, and continuing up to and including on or about the date May 3, 2022, in the State and Federal District of Nevada and elsewhere,

CHRISTOPHER STEPHEN HOUSLEY aka Robert White,

defendant herein, and others known and unknown to the grand jury, knowingly combined, conspired, confederated, and agreed with each other to distribute a mixture and substance containing a detectable amount of tapentadol, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of carisoprodol, a Schedule IV controlled substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C).

COUNT TWO

**Distribution of a Controlled Substance Causing Death
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))**

On or about May 20, 2021, in the State and Federal District of Nevada

**CHRISTOPHER STEPHEN HOUSLEY
aka Robert White,**

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of tapentadol, a Schedule II controlled substance, to J.K., and J.K.'s use of said controlled substance resulted in his death, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

**Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))**

On or about August 18, 2021, in the State and Federal District of Nevada,

CHRISTOPHER STEPHEN HOUSLEY aka Robert White,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of tapentadol, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

**Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))**

On or about October 25, 2021, in the State and Federal District of Nevada,

CHRISTOPHER STEPHEN HOUSLEY aka Robert White,

defendant herein, aided and abetted by others, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of tapentadol, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

Possession with Intent to Distribute a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

On or about May 3, 2022, in the State and Federal District of Nevada,

CHRISTOPHER STEPHEN HOUSLEY aka Robert White,

defendant herein, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled

1 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
2 841(b)(1)(C).

3 **COUNT SIX**
4 Conspiracy to Distribute Misbranded Drugs
(18 U.S.C. §371)

5 **Object of the Conspiracy**

6 Beginning from a time unknown to the Grand Jury but at least as early as
7 February 29, 2020, and continuing up to and including on or about May 3, 2022, in the
8 District of Nevada,

9 **CHRISTOPHER STEPHEN HOUSLEY**
10 **aka Robert White,**

11 defendant herein, and others known and unknown to the Grand Jury, knowingly and
12 intentionally conspired and agreed to commit offenses against the United States, namely:

13 1. Importing and bringing unlabeled bulk tadalafil and sildenafil, and
14 receiving, concealing, buying, selling, and facilitating the transportation, concealment,
15 and sale of such merchandise after importation, knowing the same to have been imported
16 and brought into the United States contrary to law, namely, 21 U.S.C. §§ 331(a) and 352,
17 in violation of Title 18, United States Code, Section 545; and

18 2. Introducing and causing the introduction of drugs that were misbranded
19 within the meaning of 21 U.S.C. § 352(f)(1) in that its labeling failed to bear adequate
20 directions for use, into interstate commerce, with the intent to defraud or mislead, in
21 violation of Title 21, United States Code, Section 331(a), 352, and 333(a)(2); and

22 3. Defrauding the United States or one of its agencies or departments, that is,
23 impeding, impairing, obstructing, and defeating the lawful and legitimate functions of the

1 FDA in investigating and enforcing federal laws and regulations related to misbranded
2 drugs, in violation of Title 18, U.S.C. § 371.

3 Overt Acts in Furtherance of the Conspiracy

4 In furtherance of the conspiracy and to carry out its object, the defendant
5 performed, or caused to be performed, one or more of the following overt acts, among
6 others:

7 1. On or about July 6, 2020, HOUSLEY used a fraudulent Florida driver's
8 license in the name of "Robert White" to register United Parcel Service boxes in Nevada for
9 the purpose of receiving bulk quantities of tadalafil and sildenafil which were misbranded as
10 Cialis and Viagra then sold. Defendant regularly retrieved and shipped boxes from these
11 locations using the alias Robert White.

12 2. Between May and June 2021, HOUSLEY paid for and shipped 4,729
13 packages. Each package had a return address as Robert White in Las Vegas, Nevada.

14 3. From a time unknown but no earlier than on or about February 29, 2020,
15 continuing up to and including on or about November 18, 2021, HOUSLEY used Phone
16 Application A to advertise to several customers drugs for sale, including, not limited to
17 "Generic Viagra," "Generic Cialis," "Xanax 2 (Alprazolam) 2 mg bars" as well as "Loose
18 Viagra" and "Loose Cialis."

19 4. "Cialis" was the trade name for Eli Lilly & Company's FDA-approved
20 erectile dysfunction drug containing the active pharmaceutical ingredient tadalafil.

22 5. "Viagra" was the trade name for Pfizer, Inc.'s FDA-approved erectile
23 dysfunction drug containing the active pharmaceutical ingredient sildenafil.

1 6. From on or about April 14, 2022, continuing up to and including on or about
 2 May 3, 2022, HOUSLEY rented a storage unit, using a false identification card in the name
 3 of Robert White, where he stored and sold misbranded drugs containing the active
 4 pharmaceutical ingredients tadalafil and sildenafil.

5 7. During the month of March 2022, CBP/HSI seized 125 inbound parcels at
 6 JFK Airport from India, addressed to Robert White in Las Vegas, Nevada. The inbound
 7 parcels contained 69 kilograms amount of bulk tadalafil and sildenafil tablets, among other
 8 drugs.

9 8. On or about the following dates, HOUSLEY caused the following shipments
 10 containing unlabeled bulk tadalafil and sildenafil to be imported from India into the United
 11 States:

Drug	Date Seized	Parcel Weight	Destination
Tadalafil	3/14/2022	416 grams	Robert White, Las Vegas, NV
Sildenafil	3/15/2022	588 grams	Robert White, Las Vegas, NV
Sildenafil	3/17/2022	1,635 grams	Robert White, Las Vegas, NV
Sildenafil	3/19/2022	598 grams	Robert White, Las Vegas, NV
Tadalafil	3/24/2022	376 grams	Robert White, Las Vegas, NV

23 9. Defendant was not registered to manufacture these drugs, nor did Defendant
 24 seek or have approval to market these drugs.

COUNT SEVEN
(Money Laundering Conspiracy)
(18 U.S.C. § 1956(h))

Beginning from a time unknown, and continuing to on or about May 3, 2022, in the State and Federal District of Nevada and elsewhere,

CHRISTOPHER STEPHEN HOUSLEY
aka Robert White,

defendant herein, together with others known and unknown to the grand jury, knowingly combined, conspired, and agreed with each other to commit the following offense against the United States.

To knowingly move by wire and other means, in and affecting interstate commerce, funds constituting criminally derived property and derived from specified unlawful activity, namely conspiracy to distribute a controlled substance as charged in Count 1 of this Indictment, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and (b)(1)(C), with the intent to promote the carrying on of the specified unlawful activity, and with intent to conceal and disguise the nature, location, source, ownership, and control of the proceeds of that specific unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i), and (B)(i), in violation of Title 18, United States Code, Section 1956(h).

DATED: this 20th day of July, 2022

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON
United States Attorney

Edward G. Veronda
EDWARD G. VERONDA
Assistant United States Attorney